

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

ADAM BRADFORD ET AL,	§	Civ. Action 6:22-CV-00406
<i>Plaintiffs,</i>	§	
	§	
	§	
v.	§	Dist. Judge Jeremy D. Kernodle
	§	
PARKER SWEENEY, ET AL.	§	Mag.Judge John D. Love
<i>Defendants</i>	§	
	§	TRIAL BY JURY

PLAINTIFFS' PROPOSED FIRST AMENDED ORIGINAL COMPLAINT
& REQUEST FOR DECLARATORY JUDGMENT

To the Honorable United States Magistrate Judge, John. D. Love:

1. Come now Plaintiffs, Adam Chase Bradford (“Adam”), Paloma Bradford (“Paloma”), Jane Doe (“Jane” or “Daughter 1”), Alice Doe (“Alice” or “Daughter 2”), and Rosa Summer (“Rosa”) (cumulatively “Plaintiffs”), and make this their

Proposed First Amended Original Complaint & Request for Declaratory Judgment.

2. Plaintiffs, complain of the following Defendants: City of Tatum, Texas (“City”), Parker Sweeney (“Sweeney”); Kenneth Jones (“ Jones”); Darin Anthony (“Darin Anthony”), Dustin Anthony (“Dustin Anthony”); Don Hall (“Hall”); Clay Lassen (“Lassen”); Tate Smith (“ T Smith”); Kim R Smith (“K Smith”); Dana

Buddecke (“Buddecke “); Wendell Moore (“Moore”); Jack York (“York”); Jeff Keller (“Keller”); Ronnie Martin (“Martin”); and April Rains (“Rains”) (“Defendants” in the aggregate).

3. In support hereof, Plaintiffs would show the following:

PARTIES

4. On August 19, 2022, Plaintiffs filed this suit in the 4th District Court of Rusk County Texas, the defendants have been served or appeared herein, and same was removed to this court on October 19, 2022.

JURISDICTION

5. Plaintiffs do not dispute that this Court has jurisdiction of the matters presented herein pursuant to Title 28 §§ 1331.and 1343.

VENUE

6. The events made the subject of this legal action occurred within the Eastern District of Texas, Tyler Division.

FACTUAL STATEMENT

7. Adam Chase Bradford is a 37 year old man, married to Paloma Bradford.

8. Adam and Paloma are the parents of two daughters, Jane and Alice.

9. Adam, Paloma and their daughters live with Paloma’s mother Rosa in her \ home at 18323 FM 1797 East, located approximately three and a half, four

miles outside of the city limits of Tatum, Texas.

10. All events made the subject of this action occurred on August 19, 2020, and arose at Rosa's and the Bradford family home, at Rosa's address.

11. On August 19, 2020, Adam and his family were dealing with COVID, Rosa still positive and on oxygen; Adam was laid off work at the time because of COVID, and had driven Paloma's SUV to Longview to run family errands and work out at the gym to regain his strength.

12. On his way home from Kilgore on SH 149, Adam's vehicle (his wife's SUV) had a flat tire, which occurred on SH 149 near an intersection with a County Road.

13. To change the tire, Adam needed a "lug key" to remove one of the lug nuts, which he could not find.

14. Adam never entered the City of Tatum, and instead driving home on the flat tire since he wasn't far from home, could use the spare, and couldn't afford a wrecker service tow.

15. As Adam approached his private driveway, Martin, the "water meter man for Crystal Farms Water Supply" had his truck blocking the entry to Adam's driveway, preventing Adam from turning off FM 1797, a notoriously dangerous road.

16. Tatum Police Department and its Police Chiefs are managed by the Tatum, City Council; the members of the City Council include Defendant Don Hall, himself a former Tatum Police Chief.

17. Ron. Martin had reportedly served under then Chief of Police Hall as an Assistant Chief of Police, being elevated when Hall resigned or was separated was formerly employed as Police Chief of the Tatum Police Department, and was forced to resign for allegedly siding with a Tatum Police Officer in a domestic disturbance, and forcing a female who had been at home drinking alcohol to leave her home in her car and drive on the public roads.^{1 2 3 4 5} Martin was dishonorably discharged by Tatum for excessive force, who had trained the Tatum police on

¹ <https://www.kltv.com/story/16541826/allegations-against-police-chief-cause-controversy/>

² Martin was replaced in January 2012 by Interim police Chief Tony Almengor who was fired by City Council on December 7, 2012, allegedly because he is Hispanic and engaged to a White/Non-Hispanic woman. https://www.news-journal.com/news/local/tatums-newest-ex-police-chief-plans-to-file-lawsuit-over-firing/article_b1f454f0-b732-5f78-b843-5a201972e383.html

³ Almengor was replaced by April Rains, and when Rains resigned, she was replaced by Interim Chief Zuniga.

⁴ Tatum's newest ex-police chief plans to file lawsuit over firing | Local News | [news-journal.com](https://www.news-journal.com/news/local/tatums-newest-ex-police-chief-plans-to-file-lawsuit-over-firing/article_b1f454f0-b732-5f78-b843-5a201972e383.html)
https://www.news-journal.com/news/local/tatums-newest-ex-police-chief-plans-to-file-lawsuit-over-firing/article_b1f454f0-b732-5f78-b843-5a201972e383.html

⁵ https://www.news-journal.com/news/local/tatum-police-chief-receives-dishonorable-discharge/article_71d1f949-8d31-5ef0-b14b-606dd0b49700.html

excessive force. Other practices and policies of the City of Tatum tend to reveal an ongoing culture of illegality in the City of Tatum.⁶

18. Meanwhile, on August 19, 2020, Adam's disabled SUV was being blocked from entry into Adam's drive by Martin's utility service vehicle, and Adam asked Martin if he could move his service truck inside and allow Adam drive up to his home.

19. Martin acted angrily, barely moved his truck apparently displeased with the inconvenience, allowing Adam to pass Martin's vehicle and drive to his home.

20. As Adam was going up the drive to his home, the rim of the flat tire caught the gate to the yard and caused his vehicle to slide into the fence, damaging the left front fender of the vehicle.

21. Adam was met by Paloma and their daughters, Rosa in her room with COVID.

22. Adam explained to Paloma what had happened to the car with the flat, and the two inspected the vehicle.

23. Adam, in his workout clothes and barefoot, went inside Rosa's house to contact his insurance company and confirm coverage.

24. Paloma recalls that it was about 7:30 P.M. On August 19, 2020.

⁶ http://www.thehendersonnews.com/news/city-of-tatum-faces-allegations-of-secret-municipal-hall-recording/article_6432c22e-1fc9-11ed-90f2-233a4c564491.html

25. While Adam had arrived home, taken off his shoes, making contact with the insurance company about his car's damage, the Defendant Anthony brothers pulled their vehicle up to meet with Martin and together the three men put together a false claim about Adams, as recorded by Sweeney's body cam.

26. When Adam parked Paloma's SUV in front of Rosa's house, Adam, met by Paloma and their daughters, at about 7:30 P.M.

27. Adam had been in the house for about 20-25 minutes, and Paloma told him the Tatum Police were at the end of the drive talking with Martin.

28. Paloma later saw Sweeney and Jones get out and start walking up to her mother's house.

29. Adam continued in his attempt to contact the insurance carrier, and Paloma told him the Tatum Police were out front of the house, clearly outside of their jurisdiction of the City of Tatum; it was later learned by Adam after he had been arrested that Sweeney was off duty and a merely a ride along with Jones, carrying a large stash of weapons (multiple AR's etc).

30. Adam's neighbor and brother in law, Juan Sanchez, was the first to approach Sweeney and Jones outside Rosa's house, and described the two officers as being angry and very aggressive, asking him who had been driving the SUV.

31. Paloma stepped outside onto the porch, and was challenged by Sweeney and Jones standing on the ground, about 6 feet below her with the question, "Whose car is this?"
32. Paloma responded, "Well, that's -- that's my car."
33. Sweeney and/or Jones then asked, "But who was driving it?"
34. Paloma replied, "My husband was driving it."
35. Sweeney and or Jones then asked, "Well, where is your husband?"
36. Adam overheard the conversation between Paloma and Sweeney and Jones, and stepped out of the house onto the porch in his workout clothes and barefoot.
37. Adam and Paloma placed their hands on the railing of the porch, which is about 6 feet above the ground level where Sweeney and Jones were standing with their hands on the butt's of their holstered pistols.
38. Adam was standing barefoot, in workout clothes on the porch above Sweeney and Jones, and respectfully answered questions from the aggressive Sweeney.
39. Sweeney asked, "What happened to the vehicle?"
40. Adam told him what had happened saying something to the effect that he
 "..had a flat. ..couldn't move it. Like, I just -- I
just drove it home on the rim and three tires."
41. Adam recalls that Sweeney and Jones then looked at each other,

and again asked, "What happened to the car?"

42. Adam repeated the facts, looked quizzically at his wife, as if to say, "Did they not hear me the first time?"

43. Then Sweeney advised Adam to come down the steps and stand on the ground level with Sweeney and Jones, but Adam replied, responded "No, I'm fine where I'm at...", still leaning onto the porch railing with both hands.

44. Adam recalls as soon as he said the word "No..." Sweeney pulled his pistol, bolting up the stairs toward Adam.

45. Adam was frightened of what Sweeney would do with the drawn gun, with Paloma on the porch both of their daughters inside the house in the living room watching cartoons, and his sick mother in law on oxygen in her room.

46. Adam turned around and hurriedly walked toward the front door, hearing Sweeney yell, "Stop or I'm going to tase you."

47. Adam stopped, turned around and asked Sweeney who still had his *pistol* in his hand, "You're going to tase me? Really? You're really going to tase me?"

48. Adam went into the house, and shut the door.

49. In comments by Sweeney to Paloma recorded by Juan Sanchez, Sweeney berated Adam to his wife telling her that Adam didn't care about her or the children; Sweeney admitted having a drawn pistol when he entered into Rosa's house to get Adam. <https://vimeo.com/775336784>

50. Adam couldn't see what was happening on the porch outside the front door and heard Sweeney making threats enforceable attempts to force open the door with his foot or hands.

51. Adam's brother-in-law, Juan Sanchez was outside the front door and videoing the events on the porch .

52. Juan Sanchez videoed the August 19, 2020 assault on his sister and brother in law are true and correct copies of the links depicting what happened on August 19, 2020. <https://vimeo.com/774837690>

53. Sweeney started kicking the door and dislodged the doorframe from the building.

54. As Sweeney was kicking in the door from the porch, Adam was standing on the inside, pushing against the door telling Sweeny, "Calm down.

Please just calm down."

55. The two frightened children were screaming, and Paloma's mother, Rosa entered into her living room with her oxygen, asking "What's going on?"

56. Adam asked Rosa, "Can you get the girls out of here? Can you please just get them out of here?"

57. So, Adam standing barefooted on the linoleum entry way, lost his balance as Sweeney gave a forceful push, causing Adam's knees to buckle, and Adam fell onto the floor.

58. Adam stood up and raised his hands in submission, nevertheless Sweeney fired the first of several Taser (2 barbs) shots at Adam; Sweeney violated Taser training and use policy.

59. The police Taser is loaded with a “magazine” containing 2 barbs to be discharged per shot, and the barbs were connected by wires to the hand-held device with a battery, and officers are trained to quickly reload with an additional “magazine” containing an additional 2 barbs.

60. As Adam was attempting to regain his footing from being knocked down by Sweeney, the latter had apparently reholstered his pistol and withdrawn his Taser device, discharging the first 2 barbs into Adam’s chest.

61. Sweeney reloaded his Taser and discharged another 2 barbs into the fallen Adam; in all, Adam had been hit by 4 Taser barbs in his chest, and Sweeney had fired another two barbs wildly toward Adam and his children.

62. Adam removed one of the barbs and the remaining 3 Taser barbs were not removed until an hour or more later by the Rusk County jailer after Adam had been booked.

63. As Adam was being handcuffed on the floor asking Sweeney and Jones what he had done and why Sweeney and Jones had broken into Rosa Summers home, Adam’s mother-in-law’s home, Paloma had been thrown on the porch deck by Sweeney and handcuffed by Jones.

64. At no time did Sweeney or Jones announce, declare or explain why they were at Rosa's home, and wanted to interrogate whoever had been driving Paloma's SUV, or Adam.

65. At no time did Sweeney or Jones notify Adam that he was being arrested or for what reason.

66. Sweeney and Jones violated orders related to the policy use of police body cameras, by Jones not wearing his body cam, and Sweeney taking his body cam off as he forced entry into Rosa's office.

67. Sweeney violated Texas Penal Code §§ 9.21, 9.22, 9.31, and 9.32, by drawing his pistol as he bolted up the steps and entered the house when Adam declined to step down from the porch onto ground level at Sweeney's statement without probable cause.

68. Sweeney and Jones violated Texas Code of Criminal Procedure 14.03 though 14.05, without probable cause.

69. Sweeney administered excessive force against Paloma by falsely accusing her of assault on a "cop", and throwing her to the ground without probable cause.

70. Sweeney administered excessive force against Adam when he tased Adam , and tased him multiple times when Adam was on the floor, without probable cause.

71. Sweeney telephoned the Tatum Police dispatcher for back-up, but none were sent to the scene outside Tatum's jurisdiction.

72. Sweeney, telephoned Rusk County Sheriff's Department for back-up since the events occurred in their jurisdiction and 7 Rusk County Deputy Sheriff's and 2 DPS troopers appeared, but because of the toxic facts provoked by Sweeney and Jones, no state of county officer became involved except one Deputy asking a question of Adam, and one Deputy asking Paloma for her driver's license.

73. The Rusk County deputy opened the door to the Tatum Police truck and asked Adam, "What happened?"

74. Adam told him, "I was just tased in front of my daughters for no justified reason."

75. Darkness fell, and Sweeney and Jones transported Adam to the Fina Station in Tatum, where Adam was met by an EMS.

76. When the Tatum police cruiser was met by the EMS, Sweeney got out and falsely claimed that he wanted to be checked because he had been hit by Adam; Sweeney filed criminal charges against Adam claiming that he had been assaulted by Adam.

77. Sweeney and Jones had sworn under oath that Adam had been guilty of felony evasion, but when the Judge questioned them, she instructed them to change their Affidavit or statement to a misdemeanor evasion because no felony had occurred, and the false swearing Sweeney and Jones did as they were told.

78. Adam was booked on the following charges: assault on a public servant; terroristic threat against a public servant; resisting arrest, search and transport; felony evading arrest, detention.

79. When Judge Enloe questioned Jones and are Sweeney, she asked if they had followed Adam from some location to his house and they said no, that is when Judge Enloe instructed Sweeney and Jones to rewrite their charge to a lesser charge.

80. Paloma remembers that on August 19, 2020 Adam left run errands and work out.

81. Paloma was caring for her 2 daughters and busy making phone calls for her mom, Rosa because of her condition and the medical necessity that she see a specialist.

82 Paloma said that she was home all day and remembers Adam calling her saying, "I ran off the road. Got a flat tire..."

83. Paloma walked outside of the house waiting for Adam to drive up and she saw him trying to get into the driveway but Martin had it blocked.

84. Paloma recalled she and Adam went inside for him to contact the insurance company and she noticed there were cops at the end of the driveway; so she walked back into the house, looks out the window and noticed they were out of

their truck looking around so she walked out on the front porch and they were talking to her brother-in-law one, asking him questions.

85. Sweeney turns to Paloma and said, "Who drives this car?"

86. Paloma replied, "It's my car." And -- you "It's my car." And -- you know."

87. Sweeney said, "Well, who was driving it?"

88. Paloma replied, "My husband. Why?"

89. Sweeney said, "Well, tell him to come out here and talk to me. I'm trying to figure out what happened."

90. Paloma said "Okay", and walked back in the house, and told Adam...So he walks out and starts talking to Sweeney and Jones, answering their questions.

91. Paloma recalled that she stood there and listened to the conversation, and then Adam starts walking back inside the house and that's when Sweeney poses Guinan and runs up the stairs, and Adam goes in the house and shuts the door.

92. As Sweeney attempted to get to the door, Paloma recalled that she stood between the door and Sweeney and said, "Hey. Hey. Dude. My kids are inside. I have 2 daughters my mom's inside with COVID. We -- like we're just now getting over COVID."

93. Sweeney told Paloma, "Move out of my way..."

94. Paloma replied "did you not hear me, like my kids are inside. COVID."

95. Sweeney then started getting really rough with Paloma physically moving her and being really aggressive and drawing back his arm like he was going to punch her, or and out of reaction her arm went up to block Sweeney's blow."
96. Sweeney then said, "That's it. You're going to jail. You just assaulted a cop."
97. Paloma said that her body then went limp and she said, "Like, I didn't hit you."
98. At that moment when she denied hitting him, Sweeney threw Paloma onto the porch and Kenneth Jones came and stood over her and put handcuffs on Paloma; Sweeney was kicking the door to break-in.
99. Paloma's brother-in-law one Sanchez had begun to video the events and Paloma yells, do something Juan" and he said "just chill out", "Chill out".
100. Jones placed Paloma in a chair on the porch after handcuffing her and Sweeney finally forces in the door Paloma was told she couldn't go inside where her children, husband and her mother were.
101. Paloma recalled that Sweeney and Jones handcuffed Adam and walked him out to their truck and that they then walked back up to the house where they started talking to her and Sweeney said, "do you know why—do you realize you just assaulted a cop?"
102. Paloma replied, "I didn't hit you. I did mean to hit you if I did."

103. Paloma replied I didn't hit you. I did mean to hitch you if I did."

104. Kenneth Jones walked up to the handcuffed Paloma and asked, "You're not going to fight me are you? I'm going to uncuff you. So I'm just making sure you're not going to hit me."

105. Kenneth Jones uncuffed Paloma and Sweeney told her saying, "we are going to—we are going to let you go tonight, but you are probably going to get something in the mail. It could take days .it could take weeks. it could take months. But you're going to get something in the mail. That you're going to get this charge were trying to get you because no one is here to stay with the girls and someone has got to stay with your mom and the girls."

106. A Rusk County Deputy Sheriff walked up and asked for Paloma's driver's license. Sweeney and Jones left with Adam in their truck closer to 9:00 PM.

107. Juan Sanchez approached his sister-in-law and said, "what you need to do is you need to get up in the morning and go to the Tatum—to the City Hall and you need to talk to somebody up there because those charges they are trying to charge you with a bad charges."

108. On the morning of August 20, 2020, Paloma dresses and Adam's mother comes to pick her up and take her to City Hall, but because of the exposure to COVID they want to admit her and no one will come to the door.

109. Paloma and her mother-in-law drove to Henderson to learn about Adam.

110. Paloma spoke with someone in the Courthouse area who tried to help her and telling her she was going to have to call Tatum, and wished Paloma good luck.

111. Paloma called Omar Zuniga Tatum's Assistant Chief of Police, and he talked to her about her concerns; Paloma asked Zuniga if she could talk to one of the cops, and she was told that one of the cops was out for a couple of days because Adam had "got him pretty good" and he had to go to the hospital last night., And the other officer didn't come on duty until midnight."

112. Adam was finally permitted to bond out of jail.

113. Paloma received a call from her mother telling her that she didn't want to scare Paloma but somebody from CPS was at her home to talk to Paloma.

114. Rosa puts the CPS agent (Daisy) on the phone with Paloma.

115. And she gets on the phone with the CPS agent , she's like, "Hi, Paloma. This is Daisy. I was called to do -- to check on some stuff. And I just -- I would really like to talk to you." Daisy told Paloma, "Just come by my office. Just come by my office, and we can talk."

116. Paloma and Adam discussed the CPS involvement and Daisy's request to speak with Paloma.

117. Adam and Paloma agreed that the 4 of them, Paloma, Adam and their 2 daughters should go meet with Daisy at her office.

118. Daisy did an interview with Paloma separately and told her that “Tatum called”, and she's kind of got to do like a check-in; the CPS Case number against Paloma and Adam was #48329650.

119. Daisy spoke with the children, Paloma, and Adam separately and viewed the video made by Juan Sanchez; at the conclusion of her investigation, Daisy stated, "Well, I'm really not sure why I was called, but I have to move forward. You know, I have to do what I have to do." And she says, "Honestly, I don't even see why I was called." She said, "Like this" -- like, I remember her, saying, "This sounds more like a civil thing than it does pertaining to anything."

120. Daisy dismissed the family and said, well, I have done all I can do today. Be careful. I'll talk to you soon.”

121. About a week later, Paloma calls Daisy (Michelle Juarez) and asked about the City of Tatum’s charges against her, and was told that Daisy had no information at the time but as soon as she hear something she would call Paloma back and that “[the City of Tatum] was wanting to press charges on Paloma still ...but nothing had been done yet and just to be on the lookout and be careful.”

122. In October 2020, the CPS officer telephoned Paloma and made an appointment to meet; in the conversation Daisy told Ms. Bradford that she had a difficult time in getting a report from the City of Tatum and that the City had changed the report or charges against Paloma and or Adam, and were still

determined to, after Paloma and to have Bradford's daughters placed under state supervision because Sweeney was alleging a felony had been committed by Paloma.

123. Sweeney was involved in a midnight accident when in uniform and in his Tatum Police Truck on October 23, 2020, when he ran into the Methodist Church in Henderson, Texas; shortly afterwards he separated from the Tatum Police Department but not disqualified by the City of Tatum for future police agency work.⁷

124. Finally, CPS concluded that the charges were unfounded and on November 4, 2020, Sweeney's, Jones' and the City of Tatum's charges were dismissed.

125. The Rusk County grand jury no-billed all charges against Adam and the Court dismissed all charges on April 27, 2021.

CAUSES OF ACTION

125. Adam and Paloma were charged with crimes by Sweeney and Jones state actors acting under color of state law on August 19, 2020, without probable cause and the charges were dismissed by the Rusk County Court on April 27, 2021.

⁷ <https://www.ketk.com/news/local-news/off-duty-tatum-officer-crashes-into-henderson-church-puts-departments-under-scrutiny/>

126. Adam and Paloma were subjected to excessive force by Sweeney and Jones state actors acting under color of state law on August 19, 2020, without probable cause.

127. Adam had a statutorily protected right to free speech to not be compelled to comply with Sweeney on August 19, 2020, and to be free from force by Sweeney and Jones by verbal provocation alone, without exigent circumstances.

128. Sweeney and Jones were substantially motivated to retaliate against Plaintiffs by arrest, assault, excessive force, fabrication of not only criminal charges but also CPS charges, all without probable cause against Plaintiffs, jointly and singularly and against the Bradford Summer's family's integrity, by Adam's refusal to descend the porch stairs.

129. Plaintiffs would not have withdrawn his pistol and or tased Adam multiple times, but for or Adam's refusal to descend the stairs from the porch on August 19, 2020.

130. Tatum has, certainly had a widespread practice, tantamount to an official policy to permit Sweeney to discretionarily disregard state law and Standard Operating Policies such as those referenced herein, because his father is the Special Investigator for the Rusk County District Attorney.

131. The Defendant Anthony brothers conspired with Martin to fabricate false claims against Adam without due process of law.

132. Defendants acted in civil conspiracy to inflict injuries, psychological and physical on the two Bradford daughters and their grandmother, Rosa.

133. Defendants City of Tatum and the members of the City Council acted to ratify each of the unconstitutional acts of Sweeney, Jones, Rains and Zuniga, complained of herein.

134. Defendants herein failed to supervise Sweeney, Jones, Rains, and Zuniga because the City and its policymakers were deliberately indifferent to the performance of Sweeney, Jones, Rains, and Zuniga.

135. Defendants acted with deliberate indifference to the rights, and privileges and immunities of Plaintiffs which were violated herein.

IMPLICATED CONSTITUTIONAL AMENDMENTS

136. Plaintiffs' claims against Defendants jointly and severally for filing criminal charges against Adam and Paloma without probable cause are grounded in the Fourth Amendment.

137. Plaintiffs' claims against Defendants jointly and severally for inflicting excessive force against Adam and Paloma without probable cause are grounded in the Fourth Amendment.

138. Plaintiffs' claims against Defendants jointly and severally for filing CPS charges against Paloma and or Adam without probable cause are grounded in the Fourth Amendment, and the Fourteenth Amendment.

PRAYER

139. If the District Court concludes that this First Amended Complaint should be Amended, to be better construed to do justice, and not the least because undersigned is currently beset with COVID since November 16/17, 2022, and dealing with the notorious effects of that disease, *then* undersigned will forthwith amend.

140. Plaintiff's seeks a declaratory judgment whereby the Defendant state actors would be declared by the court to have violated the Constitutional rights of each Plaintiff.

141. Upon trial by jury, Plaintiffs seek an award of damages against each Defendant.

142. Further Plaintiffs seek an award of reasonable and necessary attorneys fees.

143. Plaintiffs seek any other and further relief to which they may be entitled in law or equity.

Respectfully submitted,

/s/ Larry Watts

Laurence ("Larry") Watts

SBN 20981000

P.O. Box 2214, Missouri City, TX
77459

Telephone: (281) 431-1500

Facsimile: (877) 797-4055

Email: wattstrial@gmail.com

ATTORNEYS FOR PLAINTIFFS

VERIFICATION

The facts stated herein are true and correct to my personal knowledge and I make this statement subject to the pain and penalty of perjury.

/s/ *Larry Watts*

Laurence (“Larry”) Watts

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2022, a true and correct copy of the foregoing was forwarded to opposing counsel(s) of record by electronic service. Defendant Ronnie Martin, (pro se) is being serviced through United States Postal Service.

/s/ *Larry Watts*

Laurence (“Larry”) Watts